

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-cr-98

SHEDRACK UMUKORO,

Defendant.

**GOVERNMENT’S PRELIMINARY RESPONSE TO DEFENDANT’S
PRO SE LETTER RE: WITHDRAWING GUILTY PLEA**

The United States of America, by and through its attorneys, Richard G. Frohling, Acting United States Attorney, and Rebecca Taibleson and Carter Stewart, Assistant United States Attorneys, hereby files this preliminary response to the defendant’s *pro se* letter regarding withdrawing his guilty plea (R. 118).

On February 4, 2025, Shedrack Umukoro pleaded guilty to Conspiracy to Commit Money Laundering, pursuant to Count 5 of the Superseding Indictment. *See* R. 95. That plea followed the full production of discovery, much trial preparation, lengthy negotiations over the plea agreement, and an extensive plea colloquy with this Court. The plea agreement required Umukoro to pay \$100,000 in restitution to the victim, E.S., and contemplated that the United States would make a substantially mitigated sentencing recommendation to reflect the defendant’s acceptance of responsibility and efforts to make the victim whole. *See* R. 93 ¶¶ 22, 28 (Plea Agreement). The plea agreement also reflected extensive input from the victim. *See* 18 U.S.C. § 3771(a).

Umukoro remains represented by counsel, with whom the United States has been in contact regarding the sentencing date and restitution payment. On July 24, 2025, however,

Umukoro filed a *pro se* letter indicating that he would like to withdraw from his plea agreement. R. 118. “A defendant does not have a right to represent himself when he is also represented by counsel,” however, *United States v. Cross*, 962 F.3d 892, 899 (7th Cir. 2020), and Umukoro therefore may “not file *pro se* motions while represented by counsel,” *United States v. Campos-Rivera*, 15 F.4th 826, 829 (7th Cir. 2021). Umukoro has not moved to proceed *pro se* or to obtain new counsel (and in any event, his counsel is privately retained rather than Court-appointed).

As a result, at this time the United States does not intend to respond to Umukoro’s letter on the merits. Should Umukoro file a counseled motion, or should the Court request a further response, the United States will, of course, respond in full.

Dated at Milwaukee, Wisconsin, this 30th day of July, 2025.

Respectfully submitted,

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